

1 THE HONORABLE MARSHA J. PECHMAN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

17 KIM CARTER MARTINEZ, on behalf of
18 herself and all others similarly situated,

19 Plaintiff,

20 vs.

21 ZOOMINFO TECHNOLOGIES INC., a
22 Delaware corporation,

23 Defendant.

24 NO. 3:21-cv-05725-MJP

25 **JOINT STIPULATION AND
[PROPOSED] ORDER TO MODIFY
BRIEFING SCHEDULE**

26
27 **NOTE ON MOTION CALENDAR:**
February 7, 2022

JOINT STIPULATION AND [PROPOSED] ORDER TO
MODIFY BRIEFING SCHEDULE - 1
3:21-cv-05725-MJP

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1 Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff Kim Carter Martinez
2 (“Plaintiff”) and Defendant ZoomInfo Technologies, Inc. (“ZoomInfo” or “Defendant”), by
3 and through their undersigned counsel of record, hereby stipulate to modify the briefing
4 schedule for Plaintiff’s opposition to ZoomInfo’s Motion to Stay Case Pending Appeal (Doc.
5 31) and for Defendant’s reply brief thereto. In support of this stipulation, the Parties hereby
6 stipulate to the following:

7 1. Plaintiff filed a Class Action Complaint against Defendant on September 30,
8 2021. (Doc. 1).

9 2. On February 7, 2022, ZoomInfo filed a Motion to Stay Case Pending Appeal
10 (the “Motion”) (Doc. 31).

11 3. The current deadline for Plaintiff’s response to the Motion is February 21, 2021.

12 4. The current deadline for Defendant’s reply in support of the Motion is February
13 25, 2022.

14 5. Given deadlines counsel have upcoming in other cases, the Parties have agreed
15 to modify the briefing schedule for Plaintiff’s opposition to the Motion such that it is due on
16 March 7, 2022, and Defendant’s reply in support of the Motion such that it is due on March 21,
17 2022.

18 The Parties therefore respectfully request that this Court grant the below briefing
19 schedule changes.

21 Plaintiff’s Opposition to the Motion	March 7, 2022
22 Defendant’s Reply in Support of the Motion	March 21, 2022

23 WHEREAS, Plaintiff and ZoomInfo stipulate that Plaintiff shall have up to and including
24 March 7, 2022 to file its opposition to the Motion;

25 WHEREAS, Plaintiff and ZoomInfo stipulate that ZoomInfo shall have up to and

26 JOINT STIPULATION AND [PROPOSED] ORDER TO
27 MODIFY BRIEFING SCHEDULE - 2
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1 including March 21, 2022 to file its reply in support of the Motion;

2 WHEREAS, the parties have not previously requested any extension, the parties do not
3 enter into this stipulation for the purpose of delay, and the Court has not yet scheduled any pre-
4 trial or trial dates; and

5 WHEREAS, no parties will be prejudiced by the stipulation.

6 NOW THEREFORE, the parties hereby stipulate and agree, subject to the Court's
7 approval, as follows:

- 8 1. Plaintiff shall have up to and including March 7, 2022, to file its opposition to the
9 Motion; and
- 10 2. ZoomInfo shall have up to and including March 21, 2022, to file its reply in
11 support of the Motion.

12 **IT IS SO STIPULATED.**

13 Respectfully submitted,

14 Dated: February 7, 2022

TURKE & STRAUSS LLP

15 By: /s/ Samuel J. Strauss, WSBA #46971
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19 *Attorneys for Plaintiff*

20 Dated: February 7, 2022

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JOINT STIPULATION AND [PROPOSED] ORDER TO
MODIFY BRIEFING SCHEDULE - 3
3:21-cv-05725-MJP

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Attorneys for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: Ted 7/2021

Marsha J. Pechman
JUDGE MARSHA J. PECHMAN

JUDGE MARSHA J. PECHMAN

**JOINT STIPULATION AND [PROPOSED] ORDER TO
MODIFY BRIEFING SCHEDULE - 4**

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